

From: [Eric Blischke](mailto:Eric.Blischke@portofportland.com)
To: Jim.McKenna@portofportland.com; rjw@nwnatural.com; ricka@bes.ci.portland.or.us
Cc: johnson.keith@deg.state.or.us; [Chip.Humphrey](mailto:Chip.Humphrey@deg.state.or.us); [Kristine Koch](mailto:Kristine.Koch@deg.state.or.us)
Subject: Outfall Sampling Proposal
Date: 12/08/2006 03:45 PM
Attachments: [RevisedOutfallSummary.xls](#)

I appreciate the effort everyone has been putting into stormwater over the past month or so. It feels like we are getting very close. By Wednesday, we will have a recommendation from the technical team on a sampling approach to be implemented at land use and high priority sites for the 2006/2007 water year. In addition, we had a productive discussion regarding the outfalls that we will target for the 2006/2007 water year. I have attached a revised list of outfalls based on that discussion as well as input from DEQ, EPA, the Port of Portland and the City of Portland.

My expectation is that we will use this information to reach agreement on how to get the sampling done during the 2006/2007 water year and avoid unnecessary schedule delays. In order to facilitate this discussion, I wanted to offer the following straw person regarding the responsibility for performing the sampling.

To reiterate, we have come up with the following designations for stormwater outfalls:

- High priority - This category covers a range of facilities with unique contaminants or expected to be significant sources of contamination to Portland Harbor. This category includes both LWG members and non-LWG members.
- Land Use - This category covers specific land-use areas where the data may be used to estimate stormwater contributions from similar land-use areas. This category includes both industrial land use areas where hazardous substance releases are likely to have occurred as well as land use areas where hazardous substance releases are unlikely to have occurred. This category also includes both City of Portland and private party outfalls.
- T-4 Recontamination - This category covers outfalls to be sampled by the Port of Portland as part of the T-4 early action process. This is primarily a site specific sampling effort however, some of this information may be applicable to other areas.
- DEQ JSCS - This category covers sites at which whole water grabs and catch basin solids will be collected under the DEQ source control program.

Here is what I propose:

- High Priority Sites - LWG Members: These sites will be sampled by LWG members during the 2006/2007 water year using the agreed upon technical approach. This effort will be performed under the DEQ source control program with a recognition that the data is necessary to support certain in-water data evaluations.
- High Priority Sites - Non-LWG Members: EPA and DEQ will work together jointly to compel non-LWG members to perform stormwater sampling using the agreed upon approach during the 2006/2007 water year. If these sites are not sampled during the 2006/2007 water year, additional efforts will be undertaken to ensure that they are sampled using the agreed upon

approach during the 2007/2008 water year.

- Land Use Sites - Industrial Use: Private party outfalls are limited to LWG members and will be sampled during the 2006/2007 water year. City of Portland Outfalls draining industrial areas where hazardous substance releases are likely to have occurred will be sampled by the City of Portland during the 2006/2007 water year using the agreed upon approach.
- Land Use Sites - Non-industrial Sites: City of Portland outfalls draining areas where hazardous substance releases have not likely occurred will be sampled by the LWG as a whole to characterize the load from non-industrial uses.
- T-4 Recontamination: This sampling will move forward as a site specific sampling effort to support the early action.
- DEQ JSCS - This sampling will move forward as proposed to provide additional data for a broader suite of sites to inform us where additional sampling using the agreed upon approach may need to take place during the 2007/2008 water year.

This is only a proposal. However, I believe that this approach is fair and, if implemented, allows us to gather the stormwater data we need for the 2006/2007 water year and avoid unnecessary schedule delays.

I look forward to discussing this further on Wednesday.

Thanks Eric



RevisedOutfallSummary.xls